

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG COMPANY, et al.,

Defendants.

Civil Action No. 04-343 (JJF)

**PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO DEFENDANT VIEWSONIC CORPORATION**

Plaintiff LG.Philips LCD Co., Ltd. ("LPL"), by counsel and pursuant to Fed. R. Civ. P. 34, requests that Defendant ViewSonic Corporation ("ViewSonic") produce the designated documents for inspection and copying and serve a written response to these Requests within thirty (30) days from the date of service to the undersigned counsel at McKenna Long & Aldridge LLP, 1900 K Street, N.W., Washington, D.C. 20006. In lieu thereof, ViewSonic may produce and deliver to the undersigned counsel copies of such documents.

DEFINITIONS

1. For purposes of these document requests, "Interrogatory No. 2" refers to Interrogatory No. 2 in Plaintiff's Second Set of Interrogatories to ViewSonic.
2. ViewSonic should refer to Plaintiff's Second Set of Interrogatories to ViewSonic, for the definition or meaning of other terms used herein, which definitions and meanings are incorporated herein by reference.
3. All document requests and corresponding definitions of terms are for purposes of discovery only, and not to be construed as limiting or reflecting LPL's position in this case regarding claim construction or any other issue. LPL specifically reserves the right to use

- (h) whether the document was sent, and if so, the date it was sent;
 - (i) the name, address, and title of its author, its addressee, each person to whom a copy has been sent or who received a copy, and each person known to have read the document; and
 - (j) a description of the subject matter and/or contents of the document.
4. These requests shall be deemed to be continuing and responses to these Document Requests are subject to supplementation in accordance with Fed. R. Civ. P. 26(e).


**REQUESTS FOR THE PRODUCTION
OF DOCUMENTS AND THINGS**

1. All documents that you relied upon, identified, and/or agreed to produce in answering Plaintiff's Second Set of Interrogatories to you.
2. Documents sufficient to determine the structural components and assembly thereof (including, for example, the screw and hole locations used in mounting) concerning each type of visual display product responsive to Interrogatory No. 2.
3. Documents sufficient to determine how the LCD module is attached, mounted, and/or fixed within each type of visual display product with an LCD module that is responsive to Interrogatory No. 2.
4. All technical specifications and manuals corresponding to each of your visual display products responsive to Interrogatory No. 2.
5. All final blueprints and design documents used to manufacture and assemble each type of visual display product responsive to Interrogatory No. 2.
6. For each type of visual display product responsive to Interrogatory No. 2, documents sufficient to determine the quantity and price of each product manufactured each month by or for ViewSonic since January 1, 2002.

95. All documents regarding or supporting your Sixth Defense (Marking).
96. All documents regarding or supporting your Seventh Defense (Prosecution History Estoppel).
97. All documents regarding or supporting your Eighth Defense (Discovery Continuing).
98. All documents regarding or supporting any contention by you that this is an exceptional case under 35 U.S.C. § 285.
99. All documents concerning any expert who may testify for you in this case and/or whose work forms a basis, in whole or in part, for any opinion of an expert expected to testify for you in this case, including, for example, each expert's reports and draft reports for this case and other cases within the past four years, all your correspondence with such experts, all files of such experts maintained for this case, all documents provided to or created by such experts for purposes of this case, all documents considered by such experts regarding this case, all publications of the expert concerning any issues or subject matter related to the issues or subject matter in this case, and all documents reflecting time expended, services rendered, and compensation or reimbursement of same for such experts regarding this case.

November 29, 2005

THE BAYARD FIRM



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